



WILLIAM P. DENI, JR.
Director

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November 24, 2021

VIA ECF

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Jr. Bldg. & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

**Re: Bausch Health Ireland Limited, et al. v. Padagis Israel Pharmaceuticals Ltd, et al.
Civil Action No. 20-5426 (SRC) (CLW) (CONSOLIDATED)**

Dear Judge Waldor:

This firm represents Plaintiffs in the above-referenced consolidated action. We write, jointly with counsel for Defendants, to respectfully request an extension of the current case schedule as follows:

| Event | Current Date (ECF No. 41) | Proposed Amended Date |
|--|------------------------------|--------------------------|
| Fact Discovery Deadline | December 3, 2021 | January 14, 2022 |
| Exchange of opening expert reports | January 28, 2022 | February 25, 2022 |
| Exchange of rebuttal expert reports | February 25, 2022 | March 25, 2022 |
| Exchange of reply expert reports | March 18, 2022 | April 15, 2022 |
| Expert discovery deadline, including depositions | April 15, 2022 | April 29, 2022 |

In addition, the parties respectfully request that the Court set the following schedule with regard to the “second phase of claim construction . . . needed to determine and operationalize the meaning of ‘the Expected Combination’” as set forth by Judge Chesler in the Court’s November 3, 2021 Opinion & Order (ECF No. 83):

| Event | Proposed Date |
|--|-------------------|
| Exchange of proposed claim constructions | February 4, 2022 |
| Exchange of opening claim construction expert declaration | February 25, 2022 |
| Exchange of responsive claim construction expert declaration | March 25, 2022 |
| Parties to discuss whether an agreement can be reached regarding the extent to which the parties’ reply expert reports may address claim construction issues | By April 1, 2022 |
| Deadline to file opening claim construction briefs (no more than 10 pages in 12-point font) and previously-exchanged claim construction expert declarations | May 6, 2022 |
| Deadline to file responsive claim construction briefs (no more than 10 pages in 12-point font) | May 18, 2022 |

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If these deadlines are acceptable to the Court, the parties respectfully request that the Court “So Order” this letter. We thank the Court for its time and attention to this matter and are available at the Court’s convenience to address any questions or concerns.

Respectfully submitted,

s/ William P. Deni, Jr.
William P. Deni, Jr.

cc: All counsel of record (via ECF)

SO-ORDERED:

November 29, 2021

/s/ Cathy L. Waldor
Cathy L. Waldor, U.S.M.J.